

NORTH CAROLINA

WAKE COUNTY

COMMON CAUSE, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS,
IN HIS OFFICIAL CAPACITY AS
SENIOR CHAIRMAN OF THE HOUSE
SELECT COMMITTEE ON
REDISTRICTING, et al.,

Defendants.

GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18-CVS-14001

MOTION FOR ADMISSION OF
COUNSEL
PRO HAC VICE

2019 MAY -3 P 1:47

FILED

Pursuant to N.C. Gen. Stat. § 84-4.1, Movants Edwin M. Speas, Jr. and Caroline P. Mackie hereby move for the admission of William Perdue, Kaitlin Konkell, Sara Murphy D'Amico, John Cella, and John Robinson of the law firm Arnold & Porter Kaye Scholer LLP (collectively "Applicants"), to appear *pro hac vice* on behalf of Plaintiffs in the above referenced matter. In support of this motion, Edwin M. Speas, Jr., Caroline P. Mackie, and their law firm, Poyner Spruill LLP, respectfully show the Court:

1. The Statements of Applicants, attached as **Exhibits A through E** respectively, set forth their qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 84-4.1.

2. Mr. Perdue, Ms. Konkell, Ms. D'Amico, Mr. Cella and Mr. Robinson and the law firm of Arnold & Porter LLP are counsel of choice for the Plaintiff, Common Cause. A statement attesting to the retention of these Applicants and the law firm of Arnold & Porter LLP is attached to this Motion as **Exhibit F**.

3. Pursuant to N.C. Gen. Stat. § 84-4.1(5), as local counsel in this matter and a resident of North Carolina, Mr. Speas and Mrs. Mackie agree to be responsible for filing the

required registration statement for Applicants with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 84-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$1,125.00 (\$225.00 per applicant) for the *pro hac* admission of Applicants.

WHEREFORE, for the reasons set forth herein, Movants respectfully request the Court to allow this motion for admission of William Perdue, Kaitlin Konkell, Sara Murphy D'Amico, John Cella, and John Robinson of the law firm Arnold & Porter Kaye Scholer LLP in this action *pro hac vice*.

Respectfully submitted this the 3rd day of May, 2019.

POYNER SPRUILL LLP

By: _____



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Caroline P. Mackie
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Telephone: 919.783.2881
Facsimile: 919.783.1075

Attorneys for Plaintiff


CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing by depositing a copy thereof in an envelope bearing sufficient postage in the United States mail, addressed to the following person at the following address which is the last address known to me:

James Bernier
Amar Majmundar
Stephanie A. Brennan
NC Department of Justice
P.O. Box 629
114 W. Edenton St.
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jbernier@ncdoj.gov
*Counsel for the State of North Carolina and State Board of
Elections and Ethics Enforcement and its members*

Phillip J. Strach
Michael McKnight
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Raleigh, NC 27609
Phillip.strach@ogletree.com
Michael.mcknight@ogletree.com
Counsel for the Legislative Defendants

This the 3rd day of May, 2019.



Edwin M. Speas

NORTH CAROLINA

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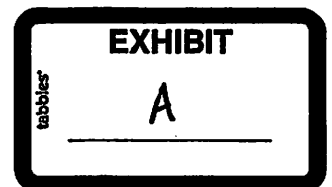
GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18-CVS-014001

**STATEMENT OF
WILLIAM PERDUE
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), William Perdue hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Ave., NW Washington, D.C. 20001. I was admitted to the District of Columbia Bar in October of 2013, and am an active member in good standing of the District of Columbia Bar. I was admitted to the New York State Bar in January 2012, and am a member in good standing of the New York State Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically), the Bar of the United States Court of Appeals for the Second Circuit (2015), the Fourth Circuit (2017), the Fifth Circuit (2018), the Sixth Circuit (2015), the Seventh Circuit (2017), the Ninth Circuit (2015), and the Eleventh Circuit (2016). I am actively engaged in the practice of law in appellate and litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.



3. Plaintiffs Common Cause and thirty-seven individual voters have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent it in connection with the above-captioned proceeding.

4. I will continue to represent Common Cause and the thirty-seven individual voters in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia and New York State Bars grant like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Edwin M. Speas, Jr. and Caroline P. Mackie in this action. Mr. Speas and Mrs. Mackie are both attorneys practicing law with Poyner Spruill LLP in Raleigh, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 2nd day of May, 2019.



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William.Perdue@arnoldporter.com

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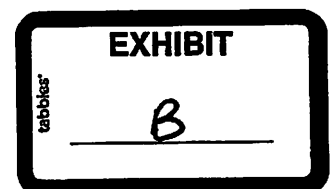
GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18-CVS-014001

**STATEMENT OF
KAITLIN KONKEL
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Kaitlin Konkelt hereby submits the following statement in support of the Motion for her admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Avenue, NW, Washington, DC 20001. I was admitted to the Massachusetts Bar in November of 2015 and am an active member in good standing of the Massachusetts Bar. I was admitted to the District of Columbia Bar in May of 2017 and am an active member in good standing of the District of Columbia Bar. I have also been admitted to, and am an active member in good standing of, the United States Court of Appeals for the Fourth Circuit (2017), the United States District Court for the District of Maryland (2017), and the United States District Court for the District of Columbia (2017). I am actively engaged in the practice of law in litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.



3. Plaintiffs Common Cause and thirty-seven individual voters have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Common Cause and thirty-seven individual voters in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Edwin M. Speas, Jr. and Caroline P. Mackie in this action. Mr. Speas and Mrs. Mackie are both attorneys practicing law with Poyner Spruill LLP in Raleigh, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 2nd day of May, 2019.



Kaitlin Konkel*

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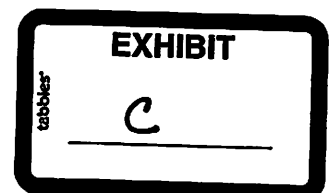
GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
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**STATEMENT OF
SARA MURPHY D'AMICO
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), **Sara Murphy D'Amico** hereby submits the following statement in support of the Motion for her admission to practice *pro hac*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Ave., NW Washington, D.C. 20001. I was admitted to the Massachusetts Bar in July 2017, and am an active member in good standing of the Massachusetts Bar. I was admitted to the District of Columbia Bar in January 2018, and am an active member in good standing of the District of Columbia Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically): the United States Court of Appeals for the Third Circuit (2018), the United States Court of Appeals for the Fourth Circuit (2019) and the United States District Court for the District of Columbia (2018). I am actively engaged in the practice of law in litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *pro hac vice* admission revoked.



3. Plaintiffs Common Cause and thirty-seven individual voters have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent it in connection with the above-captioned proceeding.

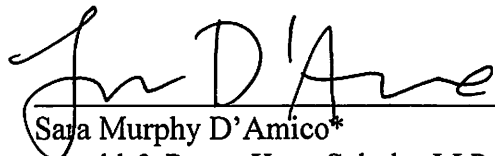
4. I will continue to represent Plaintiffs Common Cause and thirty-seven individual voters in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia Bar grants like privileges to practice on a *pro hac vice* basis to members of the North Carolina Bar in good standing.

7. I have associated and am personally appearing with Edwin M. Speas, Jr. and Caroline P. Mackie in this action. Mr. Speas and Mrs. Mackie are both attorneys practicing law with Poyner Spruill LLP in Raleigh, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 2nd day of May, 2019.

A handwritten signature in black ink, appearing to read "Sara D'Amico", written over a horizontal line.

Sara Murphy D'Amico*
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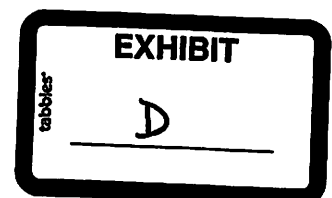
**STATEMENT OF
JOHN CELLA
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), John Cella hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter LLP. I work at its offices located at 601 Massachusetts Ave., NW, Washington, DC 20001. I was admitted to the District of Columbia Bar in December of 2016 and am an active member in good standing of the District of Columbia Bar. I was admitted to the Pennsylvania Bar in October of 2011 and am currently on inactive status. I have also been admitted to, and am an active member in good standing of, the United States District Court for the District of Columbia since 2017. I am actively engaged in the practice of law in the District of Columbia.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Common Cause and thirty-seven individual voters have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.



4. I will continue to represent Plaintiffs Common Cause and thirty-seven individual voters in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Edwin M. Speas, Jr. and Caroline P. Mackie in this action. Mr. Speas and Mrs. Mackie are both attorneys practicing law with Poyner Spruill LLP in Raleigh, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 2nd day of May, 2019.



John Cella*

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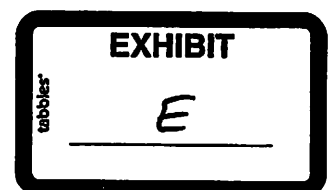
GENERAL COURT OF JUSTICE
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**STATEMENT OF
JOHN ROBINSON
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), **John Robinson** hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter LLP. I work at its offices located at 601 Massachusetts Ave., NW Washington, D.C. 20001. I was admitted to the District of Columbia Bar in March of 2017, and am an active member in good standing of the New York State Bar since April of 2013. I have also been admitted to, and am an active member in good standing of, the Bar of the United States Court of Appeals for the Third Circuit since April of 2018; United States Court of Appeals for the Fifth Circuit since December of 2018; United States District Court, District of Columbia since March of 2017; United States District Court, District of Maryland since April of 2017; United States District Court, Southern District of New York since June of 2013; United States District Court, Eastern District of New York since August of 2013; United States District Court, Western District of New York since March of 2015. I am actively engaged in the practice of law in the District of Columbia and New York.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.



3. Plaintiffs Common Cause and thirty-seven individual voters have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.


4. I will continue to represent Plaintiffs Common Cause and thirty-seven individual voters in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

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6. The District of Columbia and New York Bars grant like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Edwin M. Speas, Jr. and Caroline P. Mackie in this action. Mr. Speas and Mrs. Mackie are both attorneys practicing law with Poyner Spruill LLP in Raleigh, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 2nd day of May, 2019.



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**STATEMENT IN SUPPORT OF
ADMISSION PRO HAC VICE**

NOW COMES Common Cause and in support of the Motions for Admission of William Perdue, Kaitlin Konkell, Sara Murphy D'Amico, John Cella and John Robinson. *Pro Hac Vice*, shows the Court as follows:

1. The address of Common Cause is 907 Glenwood Avenue, Raleigh, North Carolina; and
2. Common Cause has retained William Perdue, Kaitlin Konkell, Sara Murphy D'Amico, John Cella and John Robinson of the law firm of Arnold & Porter LLP to represent it in the above-captioned action.

This the 2nd day of May, 2019.

COMMON CAUSE

By: Robert D. Phillips
Name: Robert D. Phillips
Title: executive director, Common Cause NC

